## 



## **U.S. Department of Justice**

United States Attorney Eastern District of New York

271 Cadman Plaza East Brooklyn, New York 11201

September 17, 2020

By ECF Honorable Brian M. Cogan United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Anthony Belmosa v. United States of America,

Civ. No. 19-CV-6788 (BMC) (E.D.N.Y.)

Dear Judge Cogan:

cc:

This Office represents Defendant United States of America in connection with the above-referenced Federal Tort Claims Act case, in which Plaintiff alleges that, while making a cargo delivery at the United States Post Office's ("USPS") location at JFK International Airport ("JFK"), he fell after stepping down from his truck into a defect in the pavement. The parties respectfully submit this letter concerning disputes that arose during the Plaintiff's deposition.

Earlier today, the parties attempted to contact chambers to resolve objections made during the course of the Plaintiff's deposition. While counsel initially directed his client not to answer certain lines of questioning, the parties discussed the objections and issues further, and were able to proceed and complete the deposition without the Court's intervention.

The parties thank the Court for its consideration of this matter.

Respectfully submitted,

SETH D. DUCHARME United States Attorney

By: /s/

Matthew J. Modafferi Assistant U.S. Attorney 718-254-6229

Matthew.modafferi@usdoj.gov

Matthew T. Gammons, Esq. (By ECF)

Attorney for Plaintiff